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 Sharp Electronics Manufacturing Company of America, Inc.*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SHARP ELECTRONICS CORPORATION;
 SHARP ELECTRONICS MANUFACTURING
 COMPANY OF AMERICA, INC.,

Plaintiffs,

v.

HITACHI, LTD.; HITACHI DISPLAYS, LTD.;
 HITACHI AMERICA, LTD.; HITACHI ASIA,
 LTD.; HITACHI ELECTRONIC DEVICES (USA),
 INC.; SHENZHEN SEG HITACHI COLOR
 DISPLAY DEVICES, LTD.; LG ELECTRONICS,
 INC.; LG ELECTRONICS USA, INC.; LP
 DISPLAYS INTERNATIONAL, LTD.;
 LG.PHILIPS DISPLAYS HOLDING B.V.;
 LG.PHILIPS DISPLAYS INTERNATIONAL B.V.;
 MERIDIAN SOLAR & DISPLAY CO., LTD.;
 PANASONIC CORPORATION; PANASONIC
 CORPORATION OF NORTH AMERICA;
 PANASONIC CONSUMER ELECTRONICS CO.;
 MT PICTURE DISPLAY CO., LTD.;
 MATSUSHITA ELECTRONIC CORPORATION

Case No. 13-cv-01173-SC

Case No. 07-cv-05944-SC

MDL No. 1917

**ADMINISTRATIVE MOTION TO
 SEAL PORTIONS OF PLAINTIFFS'
 FIRST AMENDED COMPLAINT**

CIVIL L.R. 79-5

(MALAYSIA) SDN BHD.; BEIJING
MATSUSHITA COLOR CRT CO., LTD.; PT.MT
PICTURE DISPLAY INDONESIA; SAMSUNG
SDI CO., LTD.; SAMSUNG SDI AMERICA, INC.;
SAMSUNG SDI (MALAYSIA) SDN BHD.;
SAMSUNG SDI MEXICO S.A. DE C.V.;
SAMSUNG SDI BRASIL LTDA.; SHENZHEN
SAMSUNG SDI CO., LTD.; TIANJIN SAMSUNG
SDI CO., LTD.; SAMSUNG SDI (HONG KONG),
LTD.; TOSHIBA CORPORATION; TOSHIBA
AMERICA, INC.; TOSHIBA AMERICA
CONSUMER PRODUCTS LLC; TOSHIBA
AMERICA ELECTRONIC COMPONENTS, INC.;
TOSHIBA AMERICA INFORMATION
SYSTEMS, INC.; TOSHIBA DISPLAY DEVICES
(THAILAND) COMPANY, LTD.; THOMSON SA
(N/K/A TECHNICOLOR SA); THOMSON
CONSUMER ELECTRONICS, INC. (N/K/A
TECHNICOLOR USA, INC.); VIDEOCON
INDUSTRIES, LTD.; TECHNOLOGIES
DISPLAYS AMERICAS LLC,

Defendants.

Pursuant to Civil Local Rules 7-11 and 79-5, plaintiffs Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of America, Inc. ("Sharp") will, and hereby do, respectfully move this Court for leave to submit under seal portions of Sharp's concurrently filed First Amended Complaint ("FAC"). In support of its request for leave to submit portions of its FAC under seal, Sharp concurrently submits the Declaration of Craig A. Benson and a [Proposed] Order in compliance with Local Rule 79-5(d).

Portions of Sharp's FAC contain discussion, analysis, references to, or information taken directly from material designated by a Defendant or Defendants in this matter as "Confidential" or "Highly Confidential" pursuant to the Protective Order applicable to this action. Specifically, portions of paragraphs 196-199, 239, 240, and 259 of Sharp's FAC contain such confidential material, and, pursuant to Local Rule 79-5(e), Sharp seeks to submit the above material under seal in good faith in order to comply with the Protective Order in this action and the applicable Local Rules.

Sharp respectfully submits this administrative motion pursuant to the Protective Order and Civil Local Rule 79-5 and hereby notifies the designating parties of their burden to establish that the designated material is sealable.

October 28, 2013

By: /s/ Craig A. Benson
Craig A. Benson

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